

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 15-10322-PBS
)
SHANE GUNN)

DEFENDANT'S MOTION FOR TRAVEL EXPENSES

Defendant, Shane Gunn, moves this Court, pursuant to 18 U.S.C. §4285, for an order directing the U.S. Marshals Service ("USMS") to provide him with funds for travel to and from his home in Tennessee to appear for his sentencing hearing.

As grounds for this motion, undersigned counsel states that Gunn's sentencing is scheduled for March 31, 2016. Gunn resides in Medina, Tennessee where he is supervised by the U.S. Pretrial Services for the Western District of Tennessee. Gunn has been declared indigent and needs logistical and financial assistance to enable him to travel between Tennessee and Boston.

The sentencing hearing, as presently framed by the parties, features contested sentencing issues with a factually complicated scenario. Undersigned counsel requires defendant's participation in preparation for the hearing. Defendant therefore requests that the Court direct the U.S. to arrange transportation to Boston on March 28, 2016, three days before the hearing.

3/24/16

allan d
D. J. Jones